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August 5, 2014

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VIA ELECTRONIC FILING

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Ms. Jocelyn Boyd
Chief Clerk & Administrator
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive, Suite 100
Columbia, SC 29210

**Re: Plantation Moving & Storage, Inc.
Docket No. 2014-289-T**

Dear Ms. Boyd:

Enclosed for filing please find Plantation Moving & Storage, Inc.'s Motion for Leave to Take a Telephone Deposition of its shipper witness(es) in the above-referenced docket. Should the Commission grant the request, we will take the deposition(s) at a time mutually agreed upon with the parties. By copy of this letter we are serving the same on the parties of record.

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.

Bonnie D. Shealy

BDS/tch
Enclosures

cc/enc: Andrew M. Bateman, Esquire (via email and US Mail)
Jeffrey M. Nelson, Esquire (via email and US Mail)
Ms. Jessica Hodges (via email)

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2014-289-T

In Re:)	
)	
Application of Plantation Moving & Storage, Inc. for a Class E (Household Goods) Certificate of Public Convenience and Necessity for Operation of Motor Vehicle Carrier)	PLANTATION MOVING & STORAGE, INC.'S MOTION FOR LEAVE TO TAKE A TELEPHONE DEPOSITION
)	
)	
)	

Pursuant to Rules 30 and 32 of the South Carolina Rules of Civil Procedure and 26 S.C. Reg. 103-834, and other applicable rules and regulations of the Public Service Commission of South Carolina (“Commission”), the Applicant Plantation Moving & Storage, Inc. (“Plantation Moving” or Applicant”) hereby requests leave to take the deposition of a shipper witness(es) by telephone. Specifically, Plantation Moving seeks to depose Robert “Bob” K. Burkhardt, Director of Operations for Bayshore Transportation in Dulles, Virginia, at a time and date to be determined in conjunction with counsel for the S.C. Office of Regulatory Staff. Should additional shipper witnesses be needed, Plantation Moving requests that it be allowed to also take his or her deposition by telephone for use in the proceedings.

Pursuant to Rule 32, S.C.R. Civ. P., Plantation Moving also requests leave to use the deposition in the merits hearing to be scheduled on the grounds that the witness is at a greater distance than 100 miles from the place of the hearing. In support of its motion, Plantation Moving would respectfully show the Commission the following:

1. The depositions shall be upon oral examination by telephone pursuant to Rule 30(b)(7), S.C. R. Civ. P., before a Notary Public or some other officer authorized by law to take

depositions, shall be recorded stenographically and shall continue from day to day until completed.

2. The shipper witness will testify regarding the market for household goods movers in South Carolina, his experience with current household goods operations in South Carolina, and how Plantation Moving could benefit the public interest if awarded a Certificate.
3. Counsel for the South Carolina Office of Regulatory Staff has indicated that he does not object to this request. The deposition(s) will take place at a time mutually agreed upon by the parties, via telephone or otherwise.

WHEREFORE, the Applicant Plantation Moving respectfully requests that the Commission issue an Order authorizing the Applicant to take the deposition of its shipper witness by telephone and allowing the Applicant to use the deposition in the hearing scheduled on the application.

Dated this 5th day of August, 2014.

ROBINSON, MCFADDEN & MOORE, P.C.



Bonnie D. Shealy
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Counsel for Plantation Moving & Storage, Inc.

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2014-289-T**

In Re:)
)
Application of Plantation Moving &)
Storage, Inc. for a Class E (Household)
Goods) Certificate of Public)
Convenience and Necessity for)
Operation of Motor Vehicle Carrier)
_____)

CERTIFICATE OF SERVICE

This is to certify that I, Toni C. Hawkins, a Paralegal with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below **Plantation Moving & Storage, Inc.’s Motion for Leave to Take A Telephone Deposition** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Andrew M. Bateman, Esquire
Jeffrey M. Nelson, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29202

Dated at Columbia, South Carolina this 5th day of August, 2014.



Toni C. Hawkins